

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00923-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00924-ADA
<i>Plaintiff,</i>	§	CIVIL ACTION 6:20-cv-00925-ADA
	§	CIVIL ACTION 6:20-cv-00926-ADA
v.	§	CIVIL ACTION 6:20-cv-00927-ADA
	§	
NEC CORPORATION,	§	
<i>Defendant.</i>	§	
	§	

JOINT STIPULATION CONCERNING PRE-MARKMAN DEADLINES

TO THE HONORABLE COURT:

Plaintiff WSOU Investments, LLC (“WSOU”) and Defendant NEC Corporation (“NEC”) (collectively, the “Parties”) submit this Joint Stipulation to memorialize their agreement to adjust the Scheduling Order. The Parties have agreed to adjust the Scheduling Order to afford the Parties more time to prepare for *Markman* and to allow the Parties to take expert depositions prior to the *Markman*. Importantly, the adjusted dates do not affect dates that would affect the Court (i.e., the *Markman* hearing date). The Parties have jointly agreed to modify the schedule as follows:

Plaintiff’s Response Claim Construction brief: October 15, 2021

Defendant’s Reply Claim Construction brief: October 29, 2021

Plaintiff’s Sur-Reply Claim Construction brief: November 8, 2021

Date: September 28, 2021

Respectfully submitted,

/s/ Mark D. Siegmund

Jonathan K. Waldrop (CA Bar No. 297903)

(Admitted in this District)

jwaldrop@kasowitz.com

Darcy L. Jones (CA Bar No. 309474)

(Admitted in this District)

djones@kasowitz.com

Marcus A. Barber (CA Bar No. 307361)

(Admitted in this District)

mbarber@kasowitz.com

John W. Downing (CA Bar No. 252850)

(Admitted in this District)

jdowning@kasowitz.com

Heather S. Kim (CA Bar No. 277686)

(Admitted in this District)

hkim@kasowitz.com

Jack Shaw (CA Bar No. 309382)

(Admitted in this District)

jshaw@kasowitz.com

KASOWITZ BENSON TORRES LLP

333 Twin Dolphin Drive,

Suite 200 Redwood Shores,

California 94065

Telephone: (650) 453-5170

Facsimile: (650) 453-5171

Mark D. Siegmund (TX Bar No. 24117055)

mark@waltfairpllc.com

LAW FIRM OF WALT FAIR, PLLC

1508 N. Valley Mills Drive

Waco, TX 76710

Telephone: (254) 772-6400

Facsimile: (254) 772-6432

**ATTORNEYS FOR PLAINTIFF WSOU
INVESTMENTS, LLC d/b/a BRAZOS
LICENSING AND DEVELOPMENT**

Date: September 28, 2021

Respectfully submitted,

By: /s/ Stuart W. Yothers

Hilda C. Galvan

Lead Attorney

Texas State Bar No. 00787512

Email: hcgaltan@jonesday.com
Keith B. Davis
Texas State Bar No. 24037895
Email: kbdavis@jonesday.com
JONES DAY
2727 N. Harwood Street, Suite 500
Dallas, TX 75201-1515
Telephone: (214) 220-3939
Facsimile: (214) 969-5100

Maxwell A. Fox
Email: mfox@jonesday.com
JONES DAY
Okura Prestige Tower 2-10-4 Toranomom
Minato-ku, Tokyo 105-0001, Japan
Telephone: (813) 6800-1876
Facsimile: (813) 5570-1520

Stuart Wesley Yothers
Email: syothers@jonesday.com
JONES DAY
250 Vesey Street
New York, NY 10281
Telephone: (212) 326-3893
Facsimile: (212) 755-7306

**ATTORNEYS FOR DEFENDANT
NEC CORPORATION**